

REMARKS

Claims 1-17 are pending. Claims 3-8 and 12-17 stand rejected under 35 U.S.C. § 112, second paragraph. Claims 1-14 stand rejected under 35 U.S.C. § 103(a) over Segaram, U.S. Patent No. 5,822,325. Claims 6-8 and 15-17 would be allowable if rewritten to overcome the rejections under 35 U.S.C. § 112, second paragraph.

By this Amendment, Applicants amend claims 3-4, 12 and 14, and respectfully traverse the rejections under 35 U.S.C. § 103.

In paragraph 2 of the Office Action, claims 3-8 and 12-17 are rejected under 35 U.S.C. § 112, second paragraph as indefinite. Applicant has amended claims 3 and 12 to overcome this rejection. The claims have not been narrowed thereby. Withdrawal of the rejections of claims 3-8 and 12-17 on this basis is respectfully requested.

In paragraph 3 of the Office Action, claims 4, 6-8 and 14 are rejected under 35 U.S.C. § 112, second paragraph, as incomplete. Applicant has amended claims 4 and 14 to overcome this rejection. The claims have not been narrowed thereby. Withdrawal of the rejections of claims 4, 6-8 and 14 on this basis is respectfully requested.

In paragraph 5 of the Office Action, claims 1-14 are rejected under 35 U.S.C. § 103 over Applicant's Admitted Prior Art in view of Segaram. Applicants respectfully traverse these rejections. Further, Applicants believe that the rejection of claims 6-8 under § 103 are in error, as they have been allowed in paragraph 6 of the Office Action if rewritten to overcome the § 112 rejections.

The Office Action has failed to establish a prima facie case of obviousness, because there is no suggestion or motivation to combine the Admitted Prior Art and Segaram. See M.P.E.P. § 2143. The Office Action acknowledges that the Admitted Prior Art fails to teach a pattern generation circuit for generating an unfixed pattern having no fixed value and

outputting the pattern to a multiplexing circuit. The Office Action then states that one of skill in the art would have been motivated to combine the Admitted Prior Art with Segaram's "random data (randenc)" (column 3, lines 7-8) "to prevent unauthorized downstream ports from receiving the data signal." This, however, is merely Segaram's reason for using random data, not a motivation to combine Segaram and the Admitted Prior Art.

As shown below, the nature of the problem to be solved in Segaram is clearly different than that faced by the Applicant because Segaram uses an unfixed pattern for security purposes, and not, as in the present invention to suppress unwanted DC components in an O/E converter.

Segaram shows using random data as a security feature. Segaram discloses a repeater interface controller ("RIC") that helps to extend the size of a LAN. (See column 1, lines 23-24.) The random pattern of Segaram is a "random Manchester encoded data ('random') signal . . . used to implement a security feature that corrupts transmit data destined for an unauthorized port or generated by an unauthorized source." (Column 3, lines 40-45, emphasis added.) The random data will not be meaningful to unauthorized users. In contrast, the present invention uses an unfixed pattern to suppress the generation of unwanted DC components in the O/E converter. One of skill in the art, looking to solve the problem of unwanted DC components in optical digital transmission equipment, would not look to the security measures of Segaram, for Segaram has no disclosure of preventing unwanted DC components.

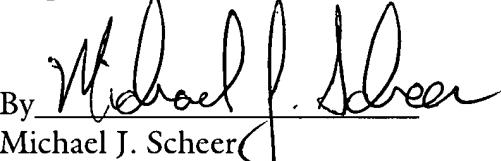
For the foregoing reasons, one of skill in the art would not find a suggestion or motivation to combine the Admitted Prior Art with Segaram. Withdrawal of the rejections of claims 1-14 under 35 U.S.C. § 103 is thus respectfully requested.

Applicants acknowledge with gratitude that claims 6-8 and 15-17 would be allowable if rewritten to overcome the rejections under 35 U.S.C. § 112, second paragraph. Applicants assume that the Examiner intends to extend this conditional allowance only if Applicants overcome the rejections of claims 6-8 under § 103 also, which Applicants have demonstrated above. Applicants respectfully defer so rewriting the claims until reconsideration of the rejections herein has been undertaken.

Applicants have amended claims 3-4, 12 and 14. Applicants have further overcome the rejections under §§ 112 and 103. In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance, and such action is earnestly solicited.

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Respectfully submitted,

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